

EXHIBIT 4

From: [Peter Curtin](#)
To: [Kyle D. Stroup](#); [Nathan F. Studeny](#); [Jon W. Groza](#); [Jon J. Pinney](#)
Cc: [Yichen Cao](#); [Campbell, Jay R.](#); [Ostrowski, Carter S.](#); [Elliot Mendelson](#)
Subject: RE: NOCO v. Aukey, et al., 1:20-cv-02322 (ND Ohio) - Deposition Notices
Date: Thursday, December 21, 2023 10:28:00 PM
Attachments: [Aukey Objections and Responses to NOCO Rule 30\(b\)\(6\) Deposition Topics.pdf](#)

Hello Kyle –

As discussed, we have attached a copy of Aukey's Objections and Responses Plaintiff's Notice of Rule 30(B)(6) deposition.

We expect to serve Aukey's Rule 30(B)(6) Deposition Notice to NOCO tomorrow.

The parties' objections and responses to those notices should help clarify and crystallize the scope of the actual discovery disputes between the parties.

Those disputes, as well as the identification of the parties' corporate witnesses and the deposition scheduling itself are topics best reserved for discussion with my replacement counsel.

Also, as a heads-up -- After more consideration, I expect to only draft and circulate a proposed [Joint] or [Unopposed] Motion to Stay the existing case deadlines of the sort discussed on our call today.

Having reviewed NOCO's December 13th letter brief, which focuses primarily on three issues, it appears that intervening events [including Aukey's recent discovery-related actions and commitments, my Motion to Withdraw as Counsel, and the planned Motion to Stay the existing case deadlines] have either mooted those disputes or at least rendered motions practice on them premature for now.

NOCO may disagree with that assessment, of course, but Aukey will likely simply file an appropriate response letter by December 27th.

Best Regards –

Peter Curtin
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